

United States District Court
District of Massachusetts

Ericson Benjamin 04-30049-KPN
VS. 6th FEBRUARY 2004

Franklin County Jail
160 Elm Street
GREENFIELD, MA 01301

Immigration and Naturalization
Service

450 main street
Hartford Conn 06103

United States District Court
District of Connecticut
450 main street
Hartford Conn. 06103

PETITION writ of HABEAS Corpus
CLASS Action Suit

This is a Habeas Class Action Case Brought
by Ericson Benjamin A prisoner at Franklin
County - to the State of Massachusetts,
The State of Connecticut, The Immigration

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DISTRICT OF MASS.
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And NATURALIZATION SERVICE And Franklin County Jail, for Violation of Civil Rights, State and Federal Codes At Franklin County. It is very clear that Franklin County Jail Facility violates the Standards Set Forth for the Jail in the Commonwealth, as well as the Constitutional Rights of the Imprisoned Inmates At Franklin County.

FOR EXAMPLE:

- 1) There are twice as many prisoners housed At Franklin County Facility.
- 2) No Ventilation.
- 3) Lead Paint.
- 4) Tiny Cells.
- 5) Inadequacies in the plumbing system.
- 6) FIRE SAFETY - i.e. NO WAY of Venting Smoke, And next to no chance of ESCAPE FOR PRISONERS IN CASE of Emergency.
- 7) Lack of Central Locking Mechanism for all the Cells is a serious and major violation of State Standards, All the Cells At Franklin County Facility must be open individually - in case of fire Someone would have to go around And unlock each Cell releasing the prisoners two At a time - which will make evacuation of the building virtually impossible - making the Franklin County Jail unsafe - And

unable to save the prisoners or everyone.

- 8) In addition to the cells being difficult to open incase of Emergency, once inside it is barely large enough to take a decent size step or stride in any direction.
- 9) No Furnishing except a Bed and toilet and Sink unit, that is installed directly adjacent to the door, thus eliminating any possibility of privacy.
- 10) The Showers are in clear view of the Female Correctional officers. As well as the Toilets which is an indignity towards the prisoners at Franklin County.
- 11) Our meals that are suppose to be hot, are cold on a continuous basis when this issue is brought to the attention of the Supervisor we are treated and spoke to with great disrespect.
- 12) Our recreating area is beyond small, it is small to the point of two people can not walk by each other without turning sideways to go by.

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What Ashame And disgrace of State And Federal Violation. IF IT PLEASE the Court To at lease have the Immigration detainee relocated At A Federal Institution. No Immigration prisoners Should be housed OR detained At A State or Local County Facility under such Condition stated. I respectfully ask the Court to Grant Petitioners Class Action Suit And Close Franklin County Jail. Base on the merits of this violation Both State And Federal And The Constitutional Rights of All the Prisoners. I hope that the Court will be just in the Seriousness of these matters And to Act Accordingly and Appropriately. Base on these Findings- It is clear of the facts that Franklin County Jail is in major violation of the Civil Rights of the prisoners At the Facility. The Immigration detainees are treated like animals having to use the Toilet And Showers in open view of male And female officers. yes, our Freedom is somewhat Lost, But we should not be force to give up our dignity AS well.

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I ASK the Court Respectfully in
Accordance with State, Federal Codes
that Franklin County Jail be close
Immediately. And OR AT LEAST TRANSFER
OR REMOVE ALL INMATES AT Franklin
County facility, especially the Immigration
detainees awaiting Court ruling from the
Second Circuit OR deportation status.

Respectfully Submitted
Ericson Benjamin
160 Elm Street
GREENFIELD, MA 01301
#224320

CERTIFICATION OF SERVICE

This is to CERTIFY THAT A COPY of the
Foregoing PETITION WAS SENT VIA MAIL
POSTAGE on this DAY 6th OF FEB 2004

United State District Court
District of MASSACHUSETTS
450 MAIN STREET
GREENFIELD, MA 01302

United State District Court
District of Connecticut
450 MAIN STREET
Hartford Conn 06103

United States Immigrations And
NATURALIZATION SERVICE
450 MAIN STREET
Hartford Conn 06103

Respectfully Submitted
ERICSON Benjamin
160 Elm Street
Greenfield MA 01301